

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

THOMAS C. GOLDSTEIN,

Defendant

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CRIMINAL NO. LKG-25-6

CONSENT MOTION FOR PROTECTIVE ORDER

The United States of America, by and through its attorneys, and with the consent of Defendant, hereby requests a Protective Order and in support thereof states as follows:

1. On January 16, 2025, a Greenbelt grand jury returned a 22-count indictment, charging the Defendant with four counts of Tax Evasion, in violation of 26 U.S.C. § 7201; ten counts of Aiding and Assisting the Preparation of False and Fraudulent Tax Returns, in violation of 26 U.S.C. § 7206(2); five counts of Willful Failure to Pay Taxes, in violation of 26 U.S.C. § 7203; and three counts of False Statements on a Loan Application, in violation of 18 U.S.C. § 1014. ECF No. 1.

2. During the investigation of these offenses, law enforcement agents gathered voluminous records that the Government wishes to provide to the defense in discovery. Throughout these discoverable materials are tax return and return information (as defined in 26 U.S.C. § 6103), tax treaty and convention information (as defined in 26 U.S.C. § 6105), and sensitive personal information (including but not limited to, names, social security numbers, bank and financial account information, dates of birth, e-mail addresses, text addresses, private telephone numbers, personal addresses, photographs, videos, or other private information), collectively, “the Protected Information.”

3. Pursuant to 26 U.S.C. §§ 6103(h)(4)(D) and 6105(a), Congress has provided for the confidentiality of tax return, return information, and tax treaty information.

4. Pursuant to the U.S. Attorney's Office policy, in the absence of a Protective Order, such Protected Information must be redacted from discovery materials before they are produced to the defense, just as they must be redacted before documents are filed with the Court, *see* Fed. R. Crim. P. 49.1. However, due to the volume of material at issue, the process of redacting the documents will take so long that the provision of discovery to the defense will be significantly delayed.

5. To allow the Government to produce the discovery materials in unredacted form, the parties request that this Court enter a Protective Order under Federal Rule of Criminal Procedure 16(d)(1). A proposed Protective Order is attached to this Consent Motion. The proposed Protective Order will protect the privacy interests of any individuals whose Protected

Information are in the discovery materials, without hampering defense counsel in the defense of this matter.

6. After consultation with counsel, Defendant consents to the entry of the Proposed Protective Order.

Respectfully submitted,

Erek L. Barron
United States Attorney
/s/

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